

1 Raymond A. Greenberg, SBN 43394
2 Raylaw43@msn.com
3 RAYMOND A. GREENBERG, ATTORNEY AT LAW
4 1521 LaVenta Road
5 Westlake Village, CA 91361
6 Telephone: 805-373-5260
7 Facsimile: 805-494-8312
8 Attorney for Plaintiff JUDITH E. GREENBERG

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JUDITH E. GREENBERG,

Plaintiff

v.

**HUNT, HENRIQUES,
MICHAEL S. HUNT, JANALIE
HENRIQUES, KURTISS A
JACOBS, ET AL**

Defendant

Case No. 11CV-3469 JHN (JCx)

**DECLARATION OF
RAYMOND A. GREENBERG
AND REQUEST FOR AWARD OF
FEES**

Hearing Date: June 27, 2011

Time: 2:00 PM

Courtroom: 790

**Judge:
The Hon. Jacqueline H. Nguyen**

DECLARATION OF RAYMOND A. GREENBERG

I, RAYMOND A. GREENBERG, DECLARE THAT:

I am attorney licensed to practice law in the state of California and a member of the Bar of the District Court for the Central District of California, and am attorney of record for Plaintiff, Judith E. Greenberg.

I have been a licensed California attorney since 1969 and my practice specializes in commercial law and litigation and administrative law. In that practice, I have litigated, on behalf of creditors owed commercial debts, between 1970 and 1995, approximately 15,000 collection lawsuits.

However, my collection practice diminished and essentially terminated in 1995.

I actively practice law and have testified as an expert witness in approximately 12 cases.

My practice does not focus on consumer collection or the Fair Debt Collection Practices Act, and thus, in order to prepare the opposition here, I had to educate myself, unlike Defendants' counsel. However, in a period of six hours, I was able to research the relevant cases under California state law and Ninth Circuit law, and discovered that Defendants' counsel had failed to cite the relevant and controlling cases set forth in Plaintiffs' Memorandum in Opposition.

It then took me 4.5 hours to prepare the written opposition, for a total time spent of 10.5 hours. My normal hourly rate is \$450.00 per hour, and that is the rate the Plaintiff has agreed to pay.

Accordingly, I request the award of \$4725.00 for attorney's fees.

Executed at Thousand Oaks, California on June 4, 2011

I declare under penalty of perjury that the foregoing is true and correct.

Signed By: s/ Raymond A. Greenberg
Raymond A. Greenberg

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF VENTURA

I am not a party to this litigation and I am over the age of 18 years. My business address is: 1521 La Venta Road, Thousand Oaks, California 91361-3404

On June 4, 2011, I served the following documents described as:

Case No. 11CV-3469 JHN (JCx)

**DECLARATION OF RAYMOND A. GREENBERG
AND REQUEST FOR AWARD OF FEES**

[X] BY ELECTRONIC MAIL: I electronically filed the following document(s) with the Clerk of the Court using the CM/ECF system, which sent electronic notification of such filing to all other parties appearing on the docket sheet, as listed below.

**Jeffrey A. Topor (SBN 195545)
SIMMONDS & NARITA LLP
44 Montgomery Street, Suite 3010
San Francisco, CA 94104-4816**

**Email: jtopor@snllp.com
Telephone: (415) 283-1000
Facsimile: (415) 352-2625**

I am "readily familiar" with this firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the United States Postal Service on that same day with postage thereon fully prepaid at Ventura County, California, in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

[X] I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on June 04, 2011, 2008, at Ventura County, California.

s/Raymond A. Greenberg
Raymond A. Greenberg